

Medical Records Obtained by Authorization

From Galveston County EMS

PO Box 939

La Marque, TX 77568

Pertaining to Raymond Luther Allen

For Anthony G. Buzbee

Nell McCallum & Associates, Inc.

19368.005

NMA  
ORIGINAL

## AFFIDAVIT

Records Pertaining To: **Raymond Luther Allen**

Type of Records: **Any and all records FOR 2/27/2012 whether medical records generated by your facility or otherwise, including but not limited to, photographs, x-ray reports, pathology reports, correspondence, notes, memoranda, consultation reports, test results, and other written records and information in the possession of or subject to the control of the witness pertaining to Raymond Luther Allen, DOB: 08/30/1977.**

Before me, the undersigned authority, personally appeared Mona Sampson,  
who, being by me duly sworn, deposed as follows: (Custodian of Records)

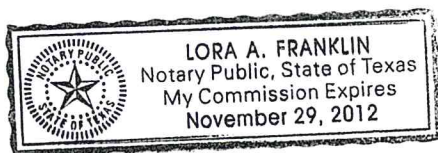
My name is Mona Sampson, I am over eighteen (18) years of age, of sound mind, capable of making this affidavit, and personally acquainted with the facts herein stated:

I am the Custodian of Records for: **Galveston County EMS**

Attached hereto are 3 pages of records pertaining to **Raymond Luther Allen** from this facility. These said records are kept in the regular course of business, and it was the regular course of business for an employee or representative of this facility, with knowledge of the act, event, condition, opinion, or diagnosis, recorded to make the record or to transmit information thereof to be included in such record; and the record was made at or near the time or reasonably soon thereafter. The records attached hereto are the original or exact duplicates of the original.

Mona Sampson  
AFFIANT (Custodian of Records)

Sworn to and subscribed before me on the 11 day of May, 2012.



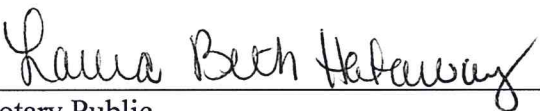
[Signature]  
NOTARY PUBLIC

My Commission Expires: 11-29-12

I, Laura Beth Hataway, a Notary Public in and for the State of Texas, do hereby certify that the foregoing Testimony of the Witness, Mona Sampson, after said witness was duly sworn by Lora A. Franklin was delivered to Nell McCallum & Associates, Inc.

I further certify that said Original Answers are being delivered to Anthony G. Buzbee, the requesting attorney, for safekeeping and use at trial.

Given under my hand and seal of office on May 16, 2012.

  
Notary Public



Nell McCallum & Associates, Inc.  
Beaumont/Houston, Texas

19368.005

Nell McCallum & Associates, Inc.

has verified that these records are complete  
and the best possible quality





## Galveston Area Ambulance Authority

Patient Care Record

Name: ALLEN, RAYMOND

Incident #: 201200001562

Date: 02/27/2012

Patient 1 of 1

Patient Information				Clinical Impression			
Last	ALLEN	Address		Primary Impression	Cardiac Arrest		
First	RAYMOND	Address 2		Secondary Impression	Respiratory Arrest		
Middle		City		Protocol Used			
Gender	Male	State		Anatomic Position			
DOB	08/30/1977	Zip		Chief Complaint			
Age	34 Yrs, 5 Months, 28 Days	Country	US	Duration		Units	
Weight	220lbs - 100kg	Tel		Secondary Complaint			
SSN		Physician		Duration		Units	
Advanced Directive				Signs & Symptoms	Cardiac - Cardiac Arrest Respiratory - Arrest		
Resident Status				Injury	- - -		
				Medical/Trauma			
				Barriers of Care	None		
				Alcohol/Drugs	Patient Admits to Drug Use		

Medication/Allergies/History	
Medications	Unknown
Allergies	Unknown
History	Unknown

Vital Signs															
Time	AVPU	Side	POS	BP	Pulse	RR	SPO2	ETCO2	CO	BG	Temp	Pain	GCS	RTS	PTS
11:22	U		Lay	/	0 A	12 V							3/NQ		
11:28	U		Lay	/	0 A	12 V							3/I		
11:29	U		Lay	/	0 A	12 V							3/I		
11:38	U		Lay	/	0 A	12 V							3/I		
11:43	U		Lay	/ M	98 I	12 V							3/I		
11:45	U		Lay	/	0 A	12 V							3/I		

ECG		
Time	3-Lead ECG	12-Lead ECG
11:22	Asystole	
11:28	PEA	
11:29	Asystole	
11:38	Asystole	
11:43	Atrial Fibrillation w/ PVC	
11:45	Atrial Fibrillation w/ PVC	

Flow Chart			Provider
Time	Treatment	Description	
11:22	Oxygen	BVM; Flow Rate 15 lpm; Patient Response: Unchanged	PEREZ, DAMARIS D
11:22	Intraosseous	Big IO; Tibia - Right; Normal Saline; Total Fluid ; Patient Response: Unchanged; Unsuccessful	RICHARDSON, JOSEPH K
11:23	Orotracheal Intubation	7.5; Placed At 23 cm; Placement Verification: Chest Rise, Colorimetric CO2, Lung Sounds, No Epigastric Sounds, Cords Visualized, Patient Response: Improved; Successful	RICHARDSON, JOSEPH K
11:23	Intraosseous	EZ-IO (Adult); Tibia - Left; Normal Saline; Total Fluid 200; Patient Response: Unchanged; Successful	FREGIA, WILLIAM P
11:25	IV Therapy	18 ga; External Jugular-Right; Normal Saline; Patient Response: Unchanged; Unsuccessful	FREGIA, WILLIAM P
11:25	Epinephrine 1:10	1 mg; Intravenous; Patient Response: Improved	RICHARDSON, JOSEPH K
11:27	IV Therapy	18 ga; Antecubital-Right; Normal Saline; Total Fluid ; Patient Response: Unchanged; Unsuccessful	WEBER, DANNY L
11:28	Epinephrine 1:10	1 mg; Intravenous; Patient Response: Improved	RICHARDSON, JOSEPH K
11:29	IV Therapy	18 ga; External Jugular-Left; Normal Saline; Total Fluid 500; Patient Response: Improved; Successful	WEBER, DANNY L
11:30	Epinephrine 1:10	1 mg; Intravenous; Patient Response: Improved	RICHARDSON, JOSEPH K
11:39	Epinephrine 1:10	1 mg; Intravenous; Patient Response: Improved	RICHARDSON, JOSEPH K
11:45	Cooling	Patient Response: Improved	RICHARDSON, JOSEPH K
11:48	Dopamine	10 mcg/kg/min; Intravenous; Patient Response: Improved	RICHARDSON, JOSEPH K





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Patient 1 of 1

Initial Assessment			
Category	Comments	Abnormalities	
Mental Status		Mental Status	⊕ Unresponsive
Skin		Skin	No Abnormalities
HEENT		Head/Face	No Abnormalities
		Eyes	⊕ Left Pupil: 6-mm, Left: Dilated, Left: Non-Responsive, Right Pupil: 6-mm, Right: Dilated, Right: Non-Responsive
		Neck	No Abnormalities
Chest		Chest	No Abnormalities
		Heart Sounds	No Abnormalities
		Lung Sounds	No Abnormalities
Abdomen		General	No Abnormalities
		Left Upper	No Abnormalities
		Right Upper	No Abnormalities
		Left Lower	No Abnormalities
		Right Lower	No Abnormalities
Back		Cervical	No Abnormalities
		Thoracic	No Abnormalities
		Lumbar/Sacral	No Abnormalities
Pelvis/GU/GI		Pelvis/GU/GI	No Abnormalities
Extremities		Left Arm	No Abnormalities
		Right Arm	No Abnormalities
		Left Leg	No Abnormalities
		Right Leg	No Abnormalities
		Pulse	⊕ Brachial: Absent, Carotid: 1+ Thready, Femoral: 1+ Thready, Radial: Absent
		Capillary Refill	Not Assessed
Neurological		Neurological	Not Assessed

Assessment Time:

## Narrative

Dispatched to assist PD. Dispatched normal traffic. Ordered to emergency traffic as ambulance approached 61st and Broadway by dispatch because PT was now unconscious. Upgraded traffic. Arrived to find PT lying supine with GFD R5 crew preparing to begin CPR. PT is pulseless and apneic. GFD is performing CPR. CPR is continuously given with breaks every 2 minutes for pulse and rhythm checks. Began ventilating PT with BVM. PT on monitor in asystole. Failed IO attempt performed with Bone Injection Gun. Intubation performed and tube secured. IO inserted with EZ-IO. Medications administered per flowchart and rhythm changes per vital signs. Was told by a PD officer on scene that the PT was drive stunned. Was also told by PD officer that PT admitted to cocaine use today. Following third administration of Epi the PT was moved to scoop stretcher and secured. Taken to stretcher and secured. Taken to ambulance and loaded. Diminished breath sounds on the left. Tube has been pushed in to 24 cm. Tube withdrawn to 23 cm and secured. Code 3 to JSER with GFD driver and GFD FF in back. At 11:43 pulse returns. Unable to auscultate BP, carotid and femoral pulse present but no brachial or radial pulse. Initiated Post-resuscitation hypothermia protocol. Cold fluid administered and cold packs are placed in armpits and groin. Administered Dopamine per flow chart. Arrived and unloaded. PT taken to JSER102. Pulse lost during transfer and is quickly regained. Report to RN and PT care turned over to JSER staff.

## Specialty Patient - CPR

Cardiac Arrest	Yes, Prior to EMS Arrival	Prearrival CPR Instructions	No	In Field Pronouncement	
Cardiac Arrest Etiology		First Defibrillated By	Not Applicable	Expired	No
Estimated Time of Arrest	4-6 Minutes	Time of First Defib		Time	
Est Time Collapse to 911	0 Minutes	Initial ECG Rhythm	Asystole	Date	
Est Time Collapse to CPR	4 Minutes	Rhythm at Destination	Atrial Fibrillation/Flutter	Physician	
Arrest Witnessed By	Bystander	Hypothermia	Yes		
CPR Initiated By	First Responder	End of Event	Ongoing Resuscitation in ED		
Time 1st CPR		ROSC	Yes, Prior to ED Arrival and at the ED		
CPR Feedback		ROSC Time	11:43 02/27/2012		
ITD Used		ROSC Occured	After ALS		
Applied AED	No	Resuscitation Discontinued	11:43 02/27/2012		
Applied By		Discontinued Reason	Return of Spontaneous Circulation (pulse or BP noted)		
Defibrillated	No	Resuscitation	Resuscitation Attempted - Yes; Attempted Ventilation, Initiated Chest Compressions		





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Patient 1 of 1

Incident Details		Destination Details		Incident Times	
Location		Disposition	Transported Lights/Siren	Call Received	11:16:00
Address	2827 61st	Transport Due To	Distance	Dispatched	11:16:00
Address 2		Transported To	UTMB- ED	En Route	11:17:00
City	Galveston	Requested By	Law Enforcement	Resp on Scene	
State	TX	Destination	Hospital ER	On Scene	11:21:00
Zip	77551	Address	301 UNIVERSITY BLVD	At Patient	11:21:00
Medic Unit	Medic 3	Address 2		Depart Scene	11:41:00
Run Type	911 Response (Emergency)	City	Galveston	At Destination	11:49:00
Priority Scene	No Lights/Sirens, Upgraded	State	TX	Pt. Transferred	
Shift	"C" Shift	Zip	77555	Incident Close	12:25:00
Zone	03 - W of 45th to 8 Mile Rd.	Zone		In District	
Level of Service		Condition at Destination			
		Destination Record #			

Crew Members		
Personnel	Role	Certification Level
RICHARDSON, JOSEPH K	Lead	EMT-Paramedic-135851;
PEREZ, DAMARIS D	Driver	EMT-Basic-705187;
FREGIA, WILLIAM P	2nd	EMT-Paramedic-132155;
WEBER, DANNY L	Other	EMT-Paramedic-24327;

Insurance Details			
Insured's Name		Primary Payer	Dispatch Nature
Relationship To Patient		Medicare	Response Urgency
Insured SSN		Medicaid	Job Related Injury
Insured DOB		Primary Insurance	Employer
Address1		Policy #	Contact
Address2		Group #	Phone
Address3		Secondary Ins	
City		Policy #	
State		Group #	
Zip			
Country			

Mileage		Delays		Additional Agencies	
Scene	1.0	Category	Delays	Galveston Fire ,Galveston PD,Galveston Sheriff Office	
Destination	7.0	Dispatch Delays	None		
Loaded Miles	6.0	Response Delays	Other		
Start	0.0	Scene Delays	Other		
End	7.0	Transport Delays	None		
Total Miles	7.0	Turn Around Delays	Equipment Replenishment		

Next of Kin				
Next of Kin Name		Address1		City
Relationship to Patient		Address2		State
Phone		Address3		Zip
				Country

Transfer Details			
PAN		Sending Physician	
PCS		Sending Record #	
ABN		Receiving Physician	
CMS Service Level		Condition Code	
ICD-9 Code		Condition Code Modifier	
Transfer Reason			
Other/Services			
Medical Necessity			



## THE BUZBEE LAW FIRM

JPMorgan Chase Tower  
600 Travis, Suite 7300  
Houston, Texas 77002  
713-223-5393  
713-223-5909 (Fax)

## Authorization For Use or Disclose Protected Health Information

As required by the Health Information Portability and Accountability Act of 2003 (HIPAA) and Texas Law; this practice may not use or disclose your individually identifiable health information except as provided in our Notice of Privacy Practices without your authorization. Your completion of this form means that you are giving permission for the uses and disclosure described below. Please review and complete this form carefully. It may be invalid if not fully completed. You may wish to ask the person or entity you want to receive your information to complete the sections detailing the information to be released the purposes for the disclosure.

I hereby authorize Hall County EMS to use and disclose health information concerning: (Patient Name) RAYMOND LUTHER ALLEN

Address: \_\_\_\_\_

☒ Any and all health information, including, but not limited to, itemized billing, mental health records, drug and/or alcohol abuse records and/or HIV test results, if any, except as specifically provided below:

Any & All Records for 2/27/2012 whether medical records generated by your facility or otherwise, including but not limited to photographs, X Ray

☒ All psychotherapy notes may be released except as specifically provided below:

Reports, pathology reports, correspondence, notes, memoranda, consultation reports, test results, and other written records and information.

This health information may be disclosed to: THE BUZBEE LAW FIRM b/t NELL McCallum & Assoc.

This information may be used only for the following purposes: LEGAL LITIGATION

I understand that I may revoke this authorization at any time notifying this medical practice in writing. My revocation will not affect actions taken by this medical practice prior to its receipt.

I understand that if neither federal nor Texas privacy law apply to the recipient of this information, the information disclosed pursuant to this authorization may be re-disclosed by the recipient and no longer protected by federal law.

I understand that my health care treatment or benefits will not be affected whether I sign or do not sign this form and I have the right to receive a copy of this authorization.

This authorization is effective now and will remain effective until END OF LITIGATION  
(Expiration Event or Date)

Signed: X Sabrina Allen Dated: 3-23-12

Print Name: Sabrina

DOB: 9-2-78 SSN: 454-777-76786

If not signed by the patient, Relationship: ☐ Parent or Guardian ☐ Guardian/Conservator of incompetent patient  
☒ Beneficiary or Personal Representative of deceased patient

Name of patient: Raymond Luther Allen DOB 9/30/77 SSN: 467-71-

NOTE: A Photocopy of This HIPAA Shall Have The Same Effect As An Original

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